

NORTHERN ALASKA ENVIRONMENTAL CENTER

VIA EMAIL

August 29, 2016

GMT-2 Scoping Comments,
Bureau of Land Management
222 West 7th Ave., Stop #13
Anchorage, AK 99513

E: BLM_AK_GMT2_Comments@blm.gov

Re: Scoping for Greater Mooses Tooth 2 Development Project, 81 Fed. Reg. 50,008 (July 29, 2016)

To Whom It May Concern:

On July 29th, 2016, the Bureau of Land Management (BLM) announced its intention to prepare a Supplemental Environmental Impact Statement (SEIS) for ConocoPhillips' proposed Greater Mooses Tooth 2 (GMT-2) development project. The SEIS will add to the 2004 Alpine Satellite Development Plan,¹ pursuant to the requirements of the National Environmental Policy Act (NEPA). It has solicited comments on the scope of the analysis it should undertake.

The Northern Alaska Environmental Center has signed onto comments directly focused on the climate context for the GMT-2 project, below we would like to address the rushed development in the NPR-A as well as the need for localized opportunities for involvement for all stakeholders living in close proximity to the landscape, not singularly those that can afford travel to meetings held around the state.

1. *Timeframe.*

Approved just last year, the GMT-1 project is still under development and its full impacts have not yet been felt or been properly assessed. Furthermore, the BLM is still in the process of incorporating public comments into its Regional Mitigation Strategy (RMS), which is intended to create a pro-active system of avoidance, minimization, and avoidance of impacts from development of GMT-1. As written in the Conceptual RMS Document, published April 15th, 2016, the purpose of the RMS is "to identify a prioritized list of mitigation actions to compensate for impacts on important resources and resource uses *in advance* of future development in the region." (italics added.)² It goes on to add, "the BLM will use the RMS when it is evaluating future development projects through the National Environmental Policy Act (NEPA) process, and as it makes permit decisions for each project."

With the full direct, indirect, and cumulative effects of GMT-1 still unknown, and with mitigation strategies in response to those unavoidable impacts of oil and gas activities still being established, BLM should postpone the permitting phase of GMT-2 until GMT-1 development has

¹ BLM 2004. Alpine Satellite Development Plan. <http://www.blm.gov/eis/AK/alpine/>

² Conceptual Regional Mitigation Strategy Document for the Northeastern Region of the National Petroleum Reserve in Alaska, Draft for Public Review, April 15th, 2016.
http://www.blm.gov/style/medialib/blm/ak/aktest/planning/NPR-A_RMS.Par.28083.File.dat/Conceptual_RMS_Document_40182016.pdf

finished and its full impacts can be assessed. This will help ensure that the full range of direct, indirect, and cumulative effects is adequately understood in advance of further development. This will also help BLM ensure that its management decisions are in line with the DOI mitigation hierarchy,³ published in 2015. The mitigation hierarchy reaffirms that “First, impacts should be avoided by altering project design, location, or declining to authorize the project; then minimized through project modifications and permit conditions; and, generally, only then compensated for remaining unavoidable impacts after all appropriate and practicable avoidance and minimization measures have been applied.”⁴

2. Community Involvement

As it frames its process of stakeholder involvement moving forward, BLM should ensure that its structure of communication includes all constituencies and prevents any possibility of real or perceived exclusivity or private discussion. By choosing Alternative A in the GMT-1 Record of Decision,⁵ which was ConocoPhillips’ preferred alternative and allowed the access road to cut through the Fish Creek setback area, BLM overrode its own preferences and those of the Nuiqsut Tribal Council.⁶ In this process, no key decisions should be made without community input. BLM should work hard to make sure that all key meetings should be located and scheduled in a way that ensures all necessary representatives are present.

Thank you for considering these comments as you prepare the NEPA analysis of the proposed GMT-2 project.

Respectfully submitted,

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³ DOI Mitigation Hierarchy, October 2015.

<https://www.doi.gov/sites/doi.gov/files/uploads/TRS%20and%20Chapter%20FINAL.pdf>

⁴ Ibid, p 3

⁵ BLM, 2015. Supplemental Environmental Impact Statement for the Alpine Satellite Development Plan for the Proposed Greater Mooses Tooth One Development Project. P 1

https://eplanning.blm.gov/epl-front-office/projects/nepa/37035/54639/59351/MASTER_GMT1ROD.Ver17_signed__2.13.15.pdf

⁶ *Alaska Dispatch News* January 25, 2015. <http://www.adn.com/energy/article/governor-blasted-over-oil-project-seeking-broad-tribal-policy/2015/01/26/>